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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-577 CRB
)	
Plaintiff,)	[PROPOSED] ORDER GRANTING UNITED
)	STATES' MOTION FOR FOREIGN DEPOSITIONS
v.)	UNDER RULE 15 OF THE FEDERAL RULES OF
)	CRIMINAL PROCEDURE
MICHAEL RICHARD LYNCH, and)	
STEPHEN KEITH CHAMBERLAIN,)	Date: November 1, 2023
)	Time: 1:30 p.m.
Defendants.)	Court: Hon. Charles R. Breyer
)	Courtroom 6, 17th Floor

Good cause shown, it is HEREBY ORDERED that the United States' Motion for Foreign Depositions Under Rule 15 of the Federal Rules of Criminal Procedure is GRANTED. The Court ORDERS pre-trial depositions of Marc Geall, David Toms, Fernando Lucini, Sean Blanchflower, Christopher Goodfellow, and Ian Black. The Court FINDS exceptional circumstances for such depositions and that they are in the interest of justice under Rule 15. The depositions shall occur at dates and times in advance of trial to be further negotiated by the parties. The parties may use all or part of

1 the deposition as provided by the Federal Rules of Evidence, as set forth in Federal Rule of Criminal
2 Procedure 15(f).

3 The Court makes the following case-specific findings: (A) the witnesses' testimony could
4 provide substantial proof of a material fact in a felony prosecution; (B) there is a substantial likelihood
5 that the witnesses' attendance at trial cannot be obtained; (C) the witnesses' presence for a deposition in
6 the United States cannot be obtained; (D) defendant Lynch cannot be present because no reasonable
7 conditions will assure an appearance at the deposition or at trial or sentencing; and (E) defendant Lynch
8 can meaningfully participate in the deposition through video or other reasonable means.

9 If Geall, Toms, Lucini, Blanchflower, Goodfellow, or Black accepts service of subpoena, no
10 deposition shall occur for such witness.

11 DATED: _____

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13 THE HONORABLE CHARLES R. BREYER
14 UNITED STATES DISTRICT JUDGE
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